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*Attorneys for Defendants JE Dunn Construction
 Company, Federal Insurance Company, Hartford
 Fire Insurance Company, and Travelers Casualty
 and Surety Company of America, Pacific Indemnity Company*

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

UNITED STATES OF AMERICA, for the use
 and benefit of SUSTAINABLE MODULAR
 MANAGEMENT, INC., a Texas corporation,

Plaintiff,

vs.

JE DUNN CONSTRUCTION
 COMPANY; FEDERAL INSURANCE
 COMPANY; HARTFORD FIRE
 INSURANCE COMPANY; TRAVELERS
 CASUALTY AND SURETY COMPANY
 OF AMERICA; DOE Individuals I-X and
 ROE Entities I-X, inclusive,

Defendants.

Case No.: 2:20-cv-00790-GMN-NJK

**STIPULATION AND ORDER FOR
 EXTENSION OF TIME TO FILE
 PRE-TRIAL ORDER**

**(SIXTH AND FINAL REQUEST FOR
 EXTENSION OF ONE WEEK)**

This Stipulation for a Sixth Extension of One Week to file the Joint Pre-Trial Order, until
 and including December 13, 2024, is made by and between Plaintiff, United States of America,
 for the use and benefit of Sustainable Modular Management, Inc. (“SMM”) and Defendants,

1 JE Dunn Construction Company (“JE Dunn”), Federal Insurance Company; Hartford Fire
2 Insurance Company; Travelers Casualty and Surety Company Of America (collectively “the
3 Surety Defendants”), and in support thereof, the Parties respectfully state:

4 1. In short, the Parties did not anticipate the need to request a further extension;
5 however, lead counsel for JE Dunn and the Surety Defendants, Robert Roos, became ill on
6 November 28, 2024 that caused him to be unable to work productively for four days, causing a
7 delay in the Parties’ preparations.

8 2. The Parties have continued to work diligently and cooperatively on the Joint
9 Proposed Pretrial Order, and since the last submission, counsel have held four extended video
10 conferences that have each been a minimum of four hours in length. Counsel have narrowed the
11 issues and agreed upon many stipulated facts, anticipate agreeing to further stipulated facts, and
12 have agreed upon a large number of contested issues of fact. Given the progress made before and
13 after Mr. Roos’ illness the Parties are confident they will complete the Joint Pretrial Order by
14 December 13, 2024.

15 3. There is good cause to grant this stipulation because the Parties have been working
16 diligently and cooperatively on the proposed Joint Proposed Pretrial Order, but were sidetracked
17 by four days due to circumstances out of their control, and therefore, an additional week is needed
18 to finalize the Joint Pretrial Order.

19 4. This is the Parties’ Sixth request for an extension of the deadline to file their Joint
20 Proposed Pretrial Order. This stipulation is filed in good faith and not intended to cause delay.

21 5. As mentioned above, the Parties are confident they can complete their Proposed
22 Joint Pretrial Order by December 13, 2024.

1 DATED this 4th day of December 2024.

DATED this 4th day of December 2024.

2 HARTWELL THALACKER, LTD.

3 LEWIS ROCA ROTHGERBER CHRISTIE LLP

4 BY: /s/ Michael S. Alfred
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10 *Attorneys for Plaintiff*

BY: /s/ Robert F. Roos (*with permission*)
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*Attorneys for Defendant/Counterclaimant
JE Dunn Construction Company and Surety
Defendants*

11 **ORDER**

12 **IT IS SO ORDERED**

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14 Dated: December 5, 2024.

15 
16 United States District Court Judge
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CERTIFICATE OF SERVICE

Pursuant to Fed. R. Civ. P. 5(b) and Section IV of District of Nevada Electronic Filing Procedures, I certify that on December 4, 2024, the above SIXTH STIPULATION AND ORDER FOR EXTENSION OF TIME TO FILE PRE-TRIAL ORDER was served via electronic service on all counsel of record.

/s/ Edye Buxbaum

An Employee of VerisLaw, PLLC